

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Dr. Gina Weisblat,)
Plaintiff,) Case No. 1:22-cv-2064
v.) Judge J. Philip Calabrese
John Carroll University,) Magistrate Judge Jonathan D. Greenberg
Defendant.)

**MOTION BY COUNSEL FOR PLAINTIFFS
FOR LEAVE TO WITHDRAW**

The undersigned counsel requests leave of this Court to withdraw as counsel of record for Dr. Gina Weisblat ("Plaintiff"). As required by Rule 83.9, written notice has been provided to the clients and all other parties as of this date.

Withdrawal has become necessary in view of an irreconcilable breakdown in the attorney-client relationship. In order to prevent any violation of the attorney-client privilege and to preserve client confidentiality, upon the Court's request, the undersigned counsel will provide declaration(s) and/or supporting details to this Court under seal for in camera review.

The relief requested in this Motion is sought in good faith and is not interposed for the purpose of delay.

Respectfully submitted

/s/ John D. Gugliotta
John D. Gugliotta (0062809)
Gugliotta & Gugliotta LPA
3020 W. Market St.
Akron, Ohio 44333
Telephone: (330) 253-2225
Fax: (330) 253-6658

johng@inventorhelp.com

/s/ Joseph A. Dunne
Joseph A. Dunne *pro hac vice*
SRIP Law
175 Pearl St. 3rd Floor
Brooklyn, NY 11201
Telephone: (561) 404-4350
Joseph.dunne@sriplaw.com

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing Motion was served on the following by delivering said copy on March 12 2024, via e-mail to counsel for Defendant at the following address:

Phillip R. Bautista
pbautista@taftlaw.com
Taft Stettinius & Hollister LLP
200 Public Square, Suite 3500
Cleveland, OH 44114-2302

Rachel A. Smoot
rsmoot@taftlaw.com
Taft Stettinius & Hollister LLP
41 S. High Street, Suite 1800
Columbus, OH 43215-4213

Respectfully submitted,

/s/ *John D. Gugliotta*
John D. Gugliotta